

FILED

SEP 06 2022

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OKLAHOMA

Mark C. McCartt, Clerk  
U.S. DISTRICT COURT

UNITED STATES OF AMERICA,

Case No.

**22CR296 CVE**

Plaintiff,

v.

LORI ANN BAILEY,

Defendant.

INDICTMENT

[COUNTS ONE through FIVE and  
ELEVEN: 18 U.S.C. § 1344 – Bank

Fraud;

COUNTS SIX through TEN: 18

U.S.C. § 1028A – Aggravated

Identity Theft;

COUNT TWELVE: 18 U.S.C. §

1708 – Possession of Stolen Mail;

COUNTS THIRTEEN through

FIFTEEN: 18 U.S.C. § 1708 – Theft

or Receipt of Stolen Mail]

THE GRAND JURY CHARGES:

COUNTS ONE through FIVE

[18 U.S.C. § 1344]

On or about May 1, 2022, in the Northern District of Oklahoma, the defendant, **LORI ANN BAILEY**, knowingly executed and attempted to execute a scheme and artifice to defraud Arvest Bank, a financial institution within the meaning of Title 18, United States Code, Section 20, the accounts of which were insured by the Federal Deposit Insurance Corporation, and to obtain moneys, funds, assets, and other property owned by and under the custody and control of Arvest Bank, by means of materially false and fraudulent pretenses, representations, and promises, by presenting for payment and using for payment Arvest debit cards issued to H.R., a person known to the Grand Jury, which **BAILEY** had stolen from the mail, for

purchases and attempted purchases at the following locations and in the approximate amounts described below:

<b>Count</b>	<b>Location</b>	<b>Amount</b>
1	Burlington, 7030 Memorial Dr., Tulsa, OK 74133	\$136.63
2	Reasor's, 7114 S. Memorial Dr., Tulsa, OK 74133	\$97.87
3	IHOP, 7007 S. Memorial Dr., Tulsa, OK 74133	\$37.43
4	Walmart, 6625 S. Memorial Dr., Tulsa, OK 74133	\$408.33
5	AutoZone, 6910 S. Memorial Dr., Tulsa, OK 74133	\$69.96

All in violation of Title 18, United States Code, Section 1344.

**COUNTS SIX through TEN**  
**[18 U.S.C. § 1028A]**

On or about May 1, 2022, in the Northern District of Oklahoma, the defendant, **LORI ANN BAILEY**, during and in relation to a felony violation enumerated in Title 18, United States Code, Section 1028A(c), namely, Bank Fraud, in violation of Title 18, United States Code, Section 1344, knowingly transferred, possessed, and used, without lawful authority, means of identification of H.R., a person known to the Grand Jury, knowing that the means of identification belonged to H.R. The means of identification included H.R.'s name and Arvest Bank debit card account numbers that were issued to H.R., which **BAILEY** transferred, possessed, and used for purchases and attempted purchases at the following locations and in the approximate amounts described below:

<b>Count</b>	<b>Location</b>	<b>Amount</b>
6	Burlington, 7030 Memorial Dr., Tulsa, OK 74133	\$136.63
7	Reasor's, 7114 S. Memorial Dr., Tulsa, OK 74133	\$97.87
8	IHOP, 7007 S. Memorial Dr., Tulsa, OK 74133	\$37.43
9	Walmart, 6625 S. Memorial Dr., Tulsa, OK 74133	\$408.33
10	AutoZone, 6910 S. Memorial Dr., Tulsa, OK 74133	\$69.96

All in violation of Title 18, United States Code, Section 1028A.

**COUNT ELEVEN**  
**[18 U.S.C. § 1344]**

On or about May 13, 2022, in the Northern District of Oklahoma, the defendant, **LORI ANN BAILEY**, knowingly executed and attempted to execute a scheme and artifice to defraud American Heritage Bank, a financial institution within the meaning of Title 18, United States Code, Section 20, the accounts of which were insured by the Federal Deposit Insurance Corporation, and to obtain moneys, funds, assets, and other property owned by and under the custody and control of American Heritage Bank, by means of materially false and fraudulent pretenses, representations, and promises, by uttering and attempting to negotiate a forged, materially altered, and fraudulently made check, which **BAILEY** then well knew to be fraudulently made, forged, materially altered, and drawn without authority on American Heritage Bank account number xxxxx9266.

All in violation of Title 18, United States Code, Section 1344.

**COUNT TWELVE**  
**[18 U.S.C. § 1708]**

On or about August 6, 2021, in the Northern District of Oklahoma, the defendant, **LORI ANN BAILEY**, unlawfully had in her possession packages, mail, and articles and things contained therein, including a package addressed to F.B., a person known to the Grand Jury, checks belonging to L.S., a person known to the Grand Jury, and Harley Davidson tags belonging to S.H., a person known to the Grand Jury, which had been stolen, taken, embezzled, and abstracted from a letter box, mail receptacle, mail route, mail receptacle, and authorized depository for mail matter, knowing the packages, mail, and articles and things contained therein had been stolen, taken, embezzled, and abstracted from a letter box, mail receptacle, mail route, mail receptacle, and authorized depository for mail matter.

All in violation of Title 18, United States Code, Section 1708.

**COUNT THIRTEEN**  
**[18 U.S.C. § 1708]**

On or about November 3, 2021, in the Northern District of Oklahoma, the defendant, **LORI ANN BAILEY**, stole, took, and abstracted three packages addressed to F.W., a person known to the Grand Jury, which had been left for collection upon and adjacent to an authorized depository for mail matter.

All in violation of Title 18, United States Code, Section 1708.

**COUNT FOURTEEN**  
**[18 U.S.C. § 1708]**

On or about December 14, 2021, in the Northern District of Oklahoma, the defendant, **LORI ANN BAILEY**, stole, took, and abstracted a package addressed to E.M, a person known to the Grand Jury, from and out of a mail receptacle and authorized depository for mail matter.

All in violation of Title 18, United States Code, Section 1708.


**COUNT FIFTEEN**  
**[18 U.S.C. § 1708]**

On or about December 22, 2021, in the Northern District of Oklahoma, the defendant, **LORI ANN BAILEY**, stole, took, and abstracted a package addressed to B.E., a person known to the Grand Jury, which had been left for collection upon and adjacent to an authorized depository for mail matter.

All in violation of Title 18, United States Code, Section 1708.

CLINTON J. JOHNSON  
United States Attorney

A TRUE BILL

  
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RICHARD M. CELLA  
Assistant United States Attorney

/s/ Grand Jury Foreperson  
Grand Jury Foreperson